

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for **2007**.

Date filed: **February 29, 2008**

Name of company covered by this certification: **Gateway Telecom, LLC, dba, StratusWave Communications**

Form 499 Filer ID: **821764**

Name of signatory: **John Reasbeck**

Title of signatory: **GM/CFO**

I, John Reasbeck, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

StratusWave has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

StratusWave has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed  _____

CPNI Corporate Certification
CPNI Policy Statement

I, John Reasbeck, CFO/ GM am a corporate officer of Gateway Telecom, LLC, d/b/a StratusWave Communications, LLC ("StratusWave"). Pursuant to 47 U.S.C. § 222; 47 C.F.R. §64.2009 of the Communications Act, I hereby state that I am responsible for company compliance with the FCC's CPNI rules and have personal knowledge that StratusWave has established procedures that are adequate to ensure compliance with the rules. StratusWave's compliance is demonstrated in this CPNI Policy Statement.

I attest to the following:

1. Our company utilizes an employee training program with a disciplinary process and supervisory review to ensure compliance with CPNI rules and regulations.
2. Our company maintains records of compliance for the minimum period as required by FCC rules and regulations.
3. Our company has a supervisory approval process in place for any proposed outbound marketing request for CPNI.
4. Our company has a notification process in place to alert law enforcement, the FCC and affected customers in the event of a CPNI breach.
5. Our company requires a photographic identification from any customers requesting account information in our retail stores. Our company does not have a mechanism whereby customers can access to their accounts online, so no password protection for online accounts is required. Our company requires that all requests for CPNI that come in by telephone be reduced to writing and sent to the Company via e-mail or paper, so no CPNI is released to customers on the telephone. Responses to customer inquiries are sent to the customer's address of record or previously-supplied e-mail account. Our company is implementing a system for password protection of customer accounts that will be effective in the near future, but believes the procedures in place as of December 31, 2007 properly authenticate all customer requests for CPNI.
5. Our company has a notification process in place for on-line authentication to provide immediate notice to customers when a customer initiated password or back-up for forgotten passwords; an on-line account; or the address of record is created or changed.
6. Our company has a formal process in place to certify the CPNI protection policies instituted by our applicable vendors, service bureaus and wholesale carriers. Our company does not conduct joint marketing with these entities and therefore is not required to obtain opt-in consent from customers for joint marketing purposes.



John Reasbeck

February 29, 2008